

FILED 09 JUL '25 1031 USDIC-ORF

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Maan Huang Sachs
(Enter full name of plaintiff)

Plaintiff,

Civil Case No. 3:25-cv-1194 AA
(to be assigned by Clerk's Office)

v.

COMPLAINT FOR VIOLATION OF CIVIL
RIGHTS (PRISONER COMPLAINT)

Adventist Hospital

(Enter full name of ALL defendant(s))

Jury Trial Demanded

☒ Yes

☐ No

Defendant(s).

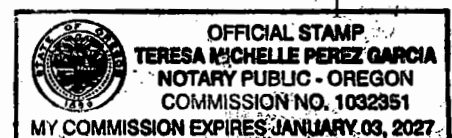
I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Maan Huang Sachs
Street Address: 6806 N. Massachusetts Ave
City, State & Zip Code: Portland Oregon 9717
Telephone No.: 503-997-9545

Complaint for Violation of Civil Rights (Prisoner Complaint)
[Rev. 01/2018]



Teresa Michelle Perez Garcia

Defendant No. 1

Name: Adventist Hospital
Street Address: 737 SE 106th Ave
City, State & Zip Code: Pottlender OR 97216
Telephone No.: _____

Defendant No. 2

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 3

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

Defendant No. 4

Name: _____
Street Address: _____
City, State & Zip Code: _____
Telephone No.: _____

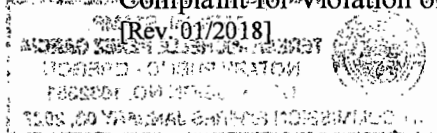
II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

- ☐ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

Complaint for Violation of Civil Rights (Prisoner Complaint)



B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

United States constitutional due process rights / HIPAA
Privacy Law

III. STATEMENT OF CLAIMS

Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

On or about May, 2025 I was transported to Adventis
Hospital by MCTD (Maitland County Jail) deputies
where I had to get checked up and medicated
for internal bleeding. A sheriff deputy transported
me there to the hospital and Adventis Hospital doctor
allowed the deputy to literally stand there and
watched as the doctor put his finger up my rectum
to see if I was still bleeding internally from the
physical assault I received from the Chesapeake
Police Department about a week prior during my
arrest. Adventis Hospital violated my privacy rights.
THE HIPAA Law!

Claim II

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

(If you have additional claims, describe them on another piece of paper, using the same outline.)

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

Wherefore Isaac Kwang Saalee respectfully pray that this Court enter judgement granting Isaac Kwang Saalee a declaration that the acts and commission describe herein violates his right under the constitution law of the United States/ HIPAA Privacy law and granting Isaac Kwang Saalee compensatory damages in the amount of \$9 million dollars against Adventis hospital.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 3 day of July, 2025

Isaac Kwang Saalee
(Signature of Plaintiff)